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**CONDITIONAL APPROVAL INACTIVE FLYASH  
REMOVAL ACTION (#8) WORK PLAN**

11-12-91

**OEPA/DOE-FO  
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LETTER**



State of Ohio Environmental Protection Agency

**Southwest District Office**

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George V. Voinovich  
Governor

November 12, 1991

Re: CONDITIONAL APPROVAL  
INACTIVE FLYASH REMOVAL  
ACTION (#8) W.P.

Mr. Jack R. Craig  
Project Manager  
U.S. DOE FEMP  
P.O. Box 398705  
Cincinnati, Ohio 45239

Date Rec'd NOV 18 1991  
Log E-0652  
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Dear Mr. Craig:

The purpose of this letter is to conditionally approve the Inactive Flyash Pile Control Removal Action (#8) Work Plan. The conditions are that DOE address, to Ohio EPA's satisfaction, the comments and suggestions listed below. DOE should note that Ohio EPA is very concerned about uranium contamination in surface soils at two sampling locations in the Inactive Flyash Pile.

Response to Comments

1. Ohio EPA Comment #2: Objectives were not provided in paragraph one of the Introduction. The only reference to an objective is in Section IV, 2nd Paragraph, "... to limit human access, which is the primary objective of this removal action." The objective(s) of this removal action should be clearly stated within the Introduction. The work plan should then go on to discuss how the objective(s) will be attained.

Removal Action Work Plan

1. The Revised Work Plan includes CIS analytical data that characterizes two surface sampling locations (24-081 and 24-241) with high levels of uranium contamination (i.e. U-234 ranging from 2850 to 11400 pc./g). These levels are on the same order of magnitude as soils near the sewage treatment plant incinerator which are designated as Removal Action #14. DOE should evaluate conducting a Part 2 of this Removal Action to include excavation and storage of soils at these two highly contaminated locations. Our concern is that although the proposed Removal Action may limit Human Access, these surface soils will continue to be subject to leaching into the aquifer, ecological exposures, and erosion by wind and water.
2. If a future problem develops with intruders gaining access to the FEMP site and the inactive flyash disposal area, DOE should consider upgrading the perimeter fence at the property line.

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partial action response  
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3. Are there DOE or NRC regulations, requirements, or orders that apply to the security of radioactively contaminated areas? If such requirements exist, they should be discussed within the work plan and achieved by this removal action.
4. DOE should include a map of the Bore Hole and Surface Sampling locations.

Removal Site Evaluation

1. Section 2.3, pg. 11, First Paragraph: The statment "Most samples showed thorium isotopes, uranium isotopes, and radium-226 at or slightly elevated from background levels" provides new insight into what DOE considers "at or slightly elevated from background levels." Comparing data from Table A to the average "background" levels stated in Table B.1 reveals that Ra-226 concentrations in 13 or 15 samples in the IAFP/SF area are at least one order of magnitude greater than the "background" concentration. U-238 concentration in 10 of 15 samples were at least an order of magnitude greater than the average "background" concentration. In addition, a majority of the Th-230 and U-234 concentrations in the IAFP/SP are significantly above what might be expected at background levels. Suggesting that the concentrations detected in the IAFP/SF area are "slightly elevated" is deceptive and misleading. It should be noted that future documents suggesting concentrations "at or slightly elevated from background levels" will be reviewed with wariness. DOE should describe the decision making process that led to this conclusion.
2. Table B.2: The table should provide a footnote defining "NV."

If you have any questions about these comments please contact me.

Sincerely,

  
Graham E. Mitchell  
Project Manager

GEM/acn

1 cc: Kathy Davidson, Ohio EPA  
Jim Saric, U.S. EPA  
Lisa August, GeoTrans  
Ed Schuessler, PRC  
Robert Owen, ODH